

UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS

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GEORGE KERSEY, individually	)	No. S. DISTRICT COURT DISTRICT OF MASS. <b>COMPLAINT</b>  <b>DEMAND FOR JURY TRIAL</b>
	)	
	)	
Plaintiff,	)	
v.	)	
DONALD J. TRUMP, individually	)	
	)	
Defendant.	)	
_____	)	

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FIRST CLAIM FOR RELIEF Defendant, as an individual is believed to be unqualified to advise Federal Officials because of his Manic Depressive (Bi-Polar) Condition, which can be verified by psychiatric examination, 4

SECOND CLAIM FOR RELIEF Defendant is partly responsible for death of the victim and injuries in the Charlottesville, VA, massacres because of way Defendant has been conducting himself causing Fascists, Nazis, and KKK members to believe that they could pursue their agenda of violent confrontation without adverse consequences ..... 4

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THIRD CLAIM FOR RELIEF Defendant improperly seeks to turn the Republican Party into an unconstitutional organization that promotes bigotry and violence ..... 4

FOURTH CLAIM FOR RELIEF Defendant was improperly elected since the power of the Electoral College to elect was terminated by the Union victory in the Civil War and the abolition of slavery. The Electoral College had been established to help protect unpopular minority positions such as slavery. With abolition of slavery the protection of unpopular positions such as slavery was terminated..... 4

FIFTH CLAIM FOR RELIEF The alleged victory of the Defendant in the Electoral College appears to be the result of Russian interference and possible Russian hacking of voting in States where Defendant allegedly received votes ..... 4

SIXTH CLAIM FOR RELIEF UNJUST ENRICHMENT/MONEY HAD AND RECEIVED by failing to pay STATUTORY share of taxes ..... 5

SEVENTH CLAIM FOR RELIEF (Acting in contrary to established scientific finding, e.g. opposing climate change) (ON BEHALF OF PLAINTIFF AND THE CLASS) ..... 5

EIGHT CLAIM FOR RELIEF (Improperly Elected by Electors and not by the popular vote of the People)

NINTH CCLAIM FOR RELIEF. Dendant has been universally recognized as “immoral” by his action in allowing children, many of them minors, to be taken away from their parent , withno plan to reunify them that mean only be described as an act of Facism

PRAYER FOR RELIEF .....5

JURY DEMAND .....5

Plaintiff George E. Kersey (“Plaintiff”), individually and pursuant to the Tenth Amendment to the U.S. Constitution as follows based upon personal knowledge, investigation, information and belief, and publicly available information:

## I. INTRODUCTION

1. This action arises from the Defendant’s repeated failure and inability to avoid violating the Constitution of the United States

2. Defendant continually misrepresents and claims as false every matter that comes to his attention, probably because of his manic depressive condition.

3. Defendant is sympathetic with American Nazis (who seek to provoke and engage in Violence in violation of the Constitution), KKK (who believe Civil War was not lost and want to continue it in violation of the Constitution) , and other hate-based organizations.

4. The Defendant improperly believes that when citizens resist the violence and bigotry of hate base organizations they are guilty of violence themselves.

5. This country fought wars against Nazi-ism and KKK-ism, and the Nazis and KKKs should not be permitted to pursue the Nazi and KKK behavior of taking violent non-peaceful actions against others

6. This country fought a war against Klan behavior, and the Klan should not be permitted to pursue the Klan behavior of taking violent non-peaceful actions against others

7. This suit is brought on behalf of Plaintiff and all other members of the public with respect to the violations of law and the Constitution.

8. As a result of these violations and breaches, this action seeks restitution; damages arising from costs of injuries, recovery of expenses; other actual, consequential, and incidental damages; interest; reasonable attorneys' fees and costs; and any other relief the Court deems just and appropriate.

## II. PARTIES

9. Plaintiff George Kersey is a natural person and a citizen of Rhode Island, who receives mail at P.O. Box 1073, Framingham, Massachusetts 01701 and P.O. Box 110, Narragansett, RI 02882. Plaintiff participated in the Second World War against Nazism and took an oath to defend the Constitution of the United States. This action is brought to defend the Constitution and to remove from office a person who appears to have a manic-depressive personality and may engage in a world-wide atomic catastrophe without a moment's notice

10. The Defendant, who, in his individual capacity improperly advises the President has residences in various parts of the United States, including New York, New Jersey, Florida and elsewhere. All of these residences are well known.

## III. JURISDICTION AND VENUE

**11. This action is brought pursuant to the 10<sup>th</sup> Amendment of the United States Constitution which guarantees all rights to the people (and the States) not granted to the Federal government. The People have the right to elect governing official and to remove them from office**

16. This Court has subject matter jurisdiction over this action because it is like a tClass Action Fairness Action ("CAFA"), 28 U.S.C. § 1332(d), since all mCitizens of the united States have been affected by ther actions of Trump and the amount in controversy exceeds \$1 million.

17. This Court has personal jurisdiction over Defendant because the wrongful actions of the Defendant were repeatedly broadcast throughout the world and to Massachusetts. Alternatively, this Court has personal jurisdiction over Defendant because Defendant has sufficient minimum contacts with Massachusetts such that the exercise of jurisdiction by this Court is consistent with notions of fair play and substantial justice: A substantial portion of the wrongdoing alleged in this Complaint has been broadcast, published and took place in Massachusetts; Defendant conducts business in Massachusetts and otherwise avails himself of the protections and benefits of Massachusetts law through the promotion, marketing, and sale of his products . This case arises out of or relates to these contacts.

18. This Court has personal jurisdiction over Defendant because Defendant does business in Massachusetts. Alternatively, this Court has personal jurisdiction over Defendant because Defendant has sufficient minimum contacts with Massachusetts such that the exercise of jurisdiction by this Court is consistent with notions of fair play and substantial justice: A substantial portion of the wrongdoing alleged in this Complaint took place in Massachusetts; Defendants conduct business in Massachusetts and otherwise avails themselves of the protections and benefits of Massachusetts law through promotion, marketing, and sales in this State; and this action arises out of or relates to these contacts.

20. Venue is proper in this District pursuant to 28 U.S.C. § 1391 because the actions of the Defendant has produced a need for police supervision of demonstrations in Massachusetts and elsewhere

21. Assignment: Assignment to the Boston division of this Court is appropriate because a recent effect of the Defendant has had an effect in the Boston area.

#### **IV. FACTUAL ALLEGATIONS**

##### **A. General Background**

22. Defendant is a well-known business entrepreneur. It would appear that his principal present goals are to engage in atomic warfare with north Korea and Iran and promote his business interests in the Soviet Union, where he more popular than in the United States, with the blessing of his friend and war-criminal Putin. Defendant is know for his many business activites, many of which fail and have to be rescued by others . It is time to rescue the United States

#### **ACTION ALLEGATIONS**

Rules 23(a) and 23 (b)(3) of FRCP

#### **V. VIOLATIONS ALLEGED**

**FIRST CLAIM FOR RELIEF** Defendant, as an individual is unqualified to advise Federal Officials because he appears to have a Manic Depressive (Bi-Polar) Condition, which can be verified by psychiatric examination, (ON BEHALF OF PLAINTIFF AND THE CLASS)

**SECOND CLAIM FOR RELIEF** Defendant is partly responsible for death of the victim in the Charlottesville, VA, massacres because of way Defendant has been conducting himself causing Fascists, Nazis, and KKK members to believe that they could pursue their agenda of violent confrontation without adverse consequences (ON BEHALF OF PLAINTIFF AND THE CLASS)

**THIRD CLAIM FOR RELIEF** Defendant is partly responsible for injuries to victims in the Charlottesville, VA, massacres because of he way Defendant has conducted himself, including his numerous "tweets" which not only appear to show bi-polar behavior but also suggest anti-Constitutional behavior (ON BEHALF OF PLAINTIFF AND THE CLASS) .

**FOURTH CLAIM FOR RELIEF** Defendant improperly seeks to turn the Republican Party into an unconstitutional organization that promotes bigotry and violence (ON BEHALF OF PLAINTIFF AND THE CLASS)



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SIXTH CLAIM FOR RELIEF UNJUST ENRICHMENT/MONEY HAD AND  
RECEIVED by failing to pay STATUTORY share of taxes (ON BEHALF OF PLAINTIFF  
AND THE CLASS)

SEVENTH CLAIM FOR RELIEF Acting in contrary to established scientific finding, e.g.  
opposing climate change (ON BEHALF OF PLAINTIFF AND THE CLASS)

EIGHT CLAIM FOR RELIEF Improperly Elected by Electors and not by the popular vote of  
the People. (ON BEHALF OF PLAINTIFF AND THE CLASS)

### **PRAYER FOR RELIEF**

Defendant requests the following relief

- A. Actual, incidental and consequential damages
- B Pre and Post Judgment Interest
- C Equitable relief and restitution
- D Equivalent attorney's fees and costs
- E Injunction
- F. All other remedies under the law

### **JURY DEMAND**

Plaintiff demands a trial by jury on all matters and issues so triable

Respectfully submitted.

/s/ George Kersey  
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